

Exhibit 31

**TODD STEUERMAN
TANKLEFF vs. COUNTY OF SUFFOLK**

**September 23, 2013
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<p>UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK -----X MARTIN TANKLEFF, Plaintiff, No. 09CV1207 -against- (JS)(WDW) THE COUNTY OF SUFFOLK, K. JAMES McCREADY, NORMAN REIN, CHARLES KOSCIUK, ROBERT DOYLE, JOHN MCELHONE, JOHN DOE POLICE OFFICERS #1-10, RICHARD DOE SUFFOLK COUNTY EMPLOYEES #1-10, Defendants. -----X September 23, 2013 1:08 p.m. Deposition of TODD STEUERMAN, taken by Plaintiff at the offices of Barket, Marion, Epstein & Kearon, 666 Old Country Road, Garden City, New York 11530, before Anneliese R. Tursi, a Registered Professional Reporter and Notary Public within and for the State of New York.</p>	<p>Page 1 A P P E A R A N C E S Page 3 ERIC T. SCHNEIDERMAN OFFICE OF THE ATTORNEY GENERAL STATE OF NEW YORK 120 BROADWAY New York, New York 10271-0332 BY: JOSEPH TIPALDO, ESQ., ASSISTANT ATTORNEY GENERAL CLAIMS BUREAU SCARING & CARMAN PLLC Attorneys for Deponent 666 Old Country Road Suite 501 Garden City, New York 11530-2004 BY: SUSAN SCARING CARMAN, ESQ. 516-683-8500 scarman@scaringlaw.com.com ALSO PRESENT: MARTIN TANKLEFF EDWARD SATTLER, Videographer</p>
<p>Page 2 A P P E A R A N C E S MILLER CHEVALIER Attorneys for Plaintiff 655 Fifteenth Street, N.W. Suite 900 Washington, D.C. 20005-5701 BY: BARRY J. POLLACK, ESQ. 202-626-5800 bpollack@milchev.com DENNIS M. BROWN SUFFOLK COUNTY ATTORNEY Attorney for Defendants H. Lee Dennison Building 5th Floor 100 Veterans Memorial Highway Hauppauge, New York 11788 BY: BRIAN C. MITCHELL, ESQ., ASSISTANT COUNTY ATTORNEY</p>	<p>Page 4 S T I P U L A T I O N S IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties herein that filing and sealing be and the same are hereby waived. IT IS FURTHER STIPULATED AND AGREED that all objections, except as to the form of the question, shall be reserved to the time of the trial. IT IS FURTHER STIPULATED AND AGREED that the within deposition may be signed and sworn to before any officer authorized to administer an oath with the same force and effect as if signed and sworn to before the Court.</p>

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<p style="text-align: right;">Page 5</p> <p>1 T. STEUERMAN</p> <p>2 THE VIDEOGRAPHER: This is tape</p> <p>3 No. 1 of the videotaped deposition of</p> <p>4 Mr. Todd Steuerman, taken by the</p> <p>5 plaintiff in the matter Martin Tankleff,</p> <p>6 plaintiff, versus the County of Suffolk,</p> <p>7 et al., defendants, in the United States</p> <p>8 District Court for the Eastern District</p> <p>9 of New York, Case No. CV 091207 (JS)</p> <p>10 (WDW).</p> <p>11 This deposition is being held at</p> <p>12 the offices of Barket, Marion, Epstein &</p> <p>13 Kearon, 666 Old Country Road, Garden</p> <p>14 City New York on September 23, 2013, at</p> <p>15 approximately 1:08 p.m.</p> <p>16 My name is Ed Sattler. I'm the</p> <p>17 certified legal video specialist. The</p> <p>18 court reporter is Anneliese Tursi in</p> <p>19 association with Esquire Deposition</p> <p>20 Solutions.</p> <p>21 Will counsel please introduce</p> <p>22 themselves and who they represent for</p> <p>23 the record.</p> <p>24 MR. POLLACK: Barry Pollack on</p> <p>25 behalf of the Plaintiff, Mr. Tankleff,</p>	<p style="text-align: right;">Page 7</p> <p>1 T. STEUERMAN</p> <p>2 it. Is that all right?</p> <p>3 A. Okay.</p> <p>4 Q. You are going to need to vocalize</p> <p>5 an answer because the court reporter cannot</p> <p>6 get down a nod or a shake of the head.</p> <p>7 A. Um-hum.</p> <p>8 Q. Do you understand if you have a</p> <p>9 problem with a question, just let me know and</p> <p>10 I will repeat it or rephrase it. Okay?</p> <p>11 A. Okay.</p> <p>12 Q. And if at any point during the</p> <p>13 afternoon you want to take a break for any</p> <p>14 reason, just let me know and we will take a</p> <p>15 break. Okay?</p> <p>16 A. Okay.</p> <p>17 Q. So if you don't ask me to repeat</p> <p>18 or rephrase a question and you give an answer,</p> <p>19 we are all going to assume that you understood</p> <p>20 the question. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. Mr. Steuerman, you were born on</p> <p>23 July 20th, 1965?</p> <p>24 A. Yes.</p> <p>25 Q. And in 1983, Mr. Steuerman, you</p>
<p style="text-align: right;">Page 6</p> <p>1 T. STEUERMAN</p> <p>2 and Mr. Tankleff is also present.</p> <p>3 MR. TANKLEFF: Martin Tankleff,</p> <p>4 plaintiff.</p> <p>5 MR. TIPALDO: Joseph Tipaldo, the</p> <p>6 Office of the Attorney General.</p> <p>7 MR. MITCHELL: And for the County</p> <p>8 of Suffolk it's Brian C. Mitchell, and</p> <p>9 I'm appearing on behalf of Dennis M.</p> <p>10 Brown, the Suffolk County Attorney.</p> <p>11 MS. CARMAN: For the witness,</p> <p>12 Susan Carman from the law firm of</p> <p>13 Scaring & Carman.</p> <p>14 T O D D S T E U E R M A N,</p> <p>15 residing at 58 Northern Boulevard,</p> <p>16 Haganan, New York 12086, having been</p> <p>17 first duly sworn/affirmed by the Notary</p> <p>18 Public (Anneliese R. Tursi), was</p> <p>19 examined and testified as follows:</p> <p>20 EXAMINATION BY MR. POLLACK:</p> <p>21 Q. Mr. Steuerman, I'm going to be</p> <p>22 asking you a series of questions this</p> <p>23 afternoon. If at any point you don't</p> <p>24 understand a question or don't hear a</p> <p>25 question, just ask me to repeat it or rephrase</p>	<p style="text-align: right;">Page 8</p> <p>1 T. STEUERMAN</p> <p>2 were charged with distributing cocaine?</p> <p>3 A. On advice of my attorney, I take</p> <p>4 the Fifth.</p> <p>5 Q. Where did those sales of cocaine</p> <p>6 take place?</p> <p>7 A. On advice of my attorney, I take</p> <p>8 the Fifth.</p> <p>9 Q. The fact is, Mr. Steuerman, you</p> <p>10 were selling cocaine out of one of the bagel</p> <p>11 stores that you owned with your father. Is</p> <p>12 that correct?</p> <p>13 A. On advice of my attorney, I take</p> <p>14 the Fifth.</p> <p>15 Q. You owned a bagel store with your</p> <p>16 father, Jerry Steuerman?</p> <p>17 A. On advice of my attorney, I take</p> <p>18 the Fifth.</p> <p>19 Q. And in those 1983 charges, you</p> <p>20 were represented by Sullivan Spota Mallito &</p> <p>21 Massey? I'm sure there are folks here who</p> <p>22 will correct me if I'm mispronouncing the</p> <p>23 names.</p> <p>24 A. On advice of my attorney, I take</p> <p>25 the Fifth.</p>

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<p style="text-align: right;">Page 9</p> <p>1 T. STEUERMAN</p> <p>2 Q. Mr. Steuerman, do you think that</p> <p>3 you may incriminate yourself by confirming who</p> <p>4 represented you in that case?</p> <p>5 MR. MITCHELL: Objection --</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 MR. MITCHELL: Did you get that?</p> <p>9 I objected to the form of his question.</p> <p>10 Q. And I guess one last instruction,</p> <p>11 Mr. Steuerman, if you do hear an objection, if</p> <p>12 you can just stop your answer so that the</p> <p>13 attorney has the opportunity to enter his</p> <p>14 objection. The court reporter can't get</p> <p>15 things down if two people are talking at the</p> <p>16 same time. Okay?</p> <p>17 A. Okay.</p> <p>18 Q. With respect to the 1983 cocaine</p> <p>19 charges, you spoke to Gerard Sullivan about</p> <p>20 those charges. Is that correct?</p> <p>21 A. On advice of my attorney, I take</p> <p>22 the Fifth.</p> <p>23 Q. And you also spoke with his</p> <p>24 partner, Thomas Spota?</p> <p>25 A. On advice of my attorney, I take</p>	<p style="text-align: right;">Page 11</p> <p>1 T. STEUERMAN</p> <p>2 Q. Valium?</p> <p>3 A. On advice of my attorney, I take</p> <p>4 the Fifth.</p> <p>5 Q. Xanax?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. And you were also convicted of</p> <p>9 selling marijuana?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. And those sales also occurred out</p> <p>13 of a bagel store owned by you and your father.</p> <p>14 Is that correct?</p> <p>15 A. On advice of my attorney, I take</p> <p>16 the Fifth.</p> <p>17 Q. Did you consult with Mr. Sullivan</p> <p>18 with respect to those charges?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. Did you also consult with Mr.</p> <p>22 Spota with respect to those charges?</p> <p>23 A. On advice of my attorney, I take</p> <p>24 the Fifth.</p> <p>25 Q. Did you obtain legal advice from</p>
<p style="text-align: right;">Page 10</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. Who referred you to Mr. Sullivan</p> <p>4 and Mr. Spota's law firm for purposes of</p> <p>5 representing you in the 1983 cocaine charges?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. In that case you had told an</p> <p>9 undercover police officer: Just call me here</p> <p>10 any time you want more blow, my father owns</p> <p>11 the place so it's cool. Is that correct?</p> <p>12 A. On advice of my attorney, I take</p> <p>13 the Fifth.</p> <p>14 Q. And in November of 1989 you were</p> <p>15 charged with the sale and possession of</p> <p>16 narcotics. Is that correct?</p> <p>17 A. On advice of my attorney, I take</p> <p>18 the Fifth.</p> <p>19 Q. Specifically, you were charged</p> <p>20 with selling cocaine. Correct?</p> <p>21 A. On advice of my attorney, I take</p> <p>22 the Fifth.</p> <p>23 Q. Diazepam, correct?</p> <p>24 A. On advice of my attorney, I take</p> <p>25 the Fifth.</p>	<p style="text-align: right;">Page 12</p> <p>1 T. STEUERMAN</p> <p>2 Mr. Spota with respect to those charges?</p> <p>3 A. On advice of my attorney, I take</p> <p>4 the Fifth.</p> <p>5 Q. Other than the 1983 and the 1989</p> <p>6 charges, are there other legal matters on</p> <p>7 which you consulted with or obtained legal</p> <p>8 advice from Mr. Sullivan?</p> <p>9 A. On advice of my attorney, I take</p> <p>10 the Fifth.</p> <p>11 Q. Other than the 1983 and 1989</p> <p>12 charges, were there other legal matters with</p> <p>13 which you consulted with or obtained legal</p> <p>14 advice from Mr. Spota?</p> <p>15 A. On advice of my attorney, I take</p> <p>16 the Fifth.</p> <p>17 Q. You were also charged with selling</p> <p>18 narcotics from the Smithtown Motor Lodge. Is</p> <p>19 that correct?</p> <p>20 A. On advice of my attorney, I take</p> <p>21 the Fifth.</p> <p>22 Q. When you were incarcerated in</p> <p>23 Clinton Correctional Facility, you met another</p> <p>24 inmate there by the name of Bruce Demps. Is</p> <p>25 that correct?</p>

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<p style="text-align: right;">Page 13</p> <p>1 T. STEUERMAN</p> <p>2 A. On advice of my attorney, I take</p> <p>3 the Fifth.</p> <p>4 MR. MITCHELL: Could you spell</p> <p>5 that guy's last name.</p> <p>6 MR. POLLACK: Sure. Demps.</p> <p>7 D-E-M-P-S.</p> <p>8 MR. MITCHELL: Thank you.</p> <p>9 Q. And, Mr. Steuerman, you told Mr.</p> <p>10 Demps that you knew that Marty Tankleff was</p> <p>11 not involved in the murder of his parents. Is</p> <p>12 that correct?</p> <p>13 A. On advice of my attorney, I take</p> <p>14 the Fifth.</p> <p>15 Q. In fact, you told Mr. Demps that</p> <p>16 your father, Jerry Steuerman, had put a hit on</p> <p>17 the Tankleffs. Is that correct?</p> <p>18 A. On advice of my attorney, I take</p> <p>19 the Fifth.</p> <p>20 Q. And regardless of the precise</p> <p>21 words, the substance of what it was that you</p> <p>22 were conveying is that your father hired</p> <p>23 somebody to murder the Tankleffs. Is that</p> <p>24 correct?</p> <p>25 A. On advice of my attorney, I take</p>	<p style="text-align: right;">Page 15</p> <p>1 T. STEUERMAN</p> <p>2 illegal controlled substances out of bagel</p> <p>3 stores that were owned by either you or your</p> <p>4 father. Is that correct?</p> <p>5 A. On advice of my attorney, I take</p> <p>6 the Fifth.</p> <p>7 Q. And your father, Jerry Steuerman,</p> <p>8 knew that you were selling illegal drugs. Is</p> <p>9 that correct?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. In fact, your father, Jerry</p> <p>13 Steuerman, was involved in the sale of</p> <p>14 narcotics or illegal substances with you. Is</p> <p>15 that correct?</p> <p>16 A. On advice of my attorney, I take</p> <p>17 the Fifth.</p> <p>18 Q. Mr. Steuerman, I want to focus</p> <p>19 your attention on a particular date, September</p> <p>20 7th, 1988. And that is the date that Mrs.</p> <p>21 Tankleff was murdered and Mr. Seymour Tankleff</p> <p>22 was attacked. What I want to ask you is, as</p> <p>23 of that date did you know Detective James</p> <p>24 McCready?</p> <p>25 A. On advice of my attorney, I take</p>
<p style="text-align: right;">Page 14</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. At Mr. Demps's request you had</p> <p>4 your father, Jerry Steuerman, hire people to</p> <p>5 threaten a gentleman who was, according to Mr.</p> <p>6 Demps, messing with Mr. Demps' girlfriend. Is</p> <p>7 that correct?</p> <p>8 A. On advice of my attorney, I take</p> <p>9 the Fifth.</p> <p>10 Q. You also had your father hire</p> <p>11 people to physically beat a Clinton</p> <p>12 Correctional Officer that was having an affair</p> <p>13 with your wife. Is that correct?</p> <p>14 A. On advice of my attorney, I take</p> <p>15 the Fifth.</p> <p>16 Q. Over a period of years in the</p> <p>17 1980s, Mr. Steuerman, you were selling</p> <p>18 narcotics. Correct?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. You were selling illegal</p> <p>22 controlled substances. Correct?</p> <p>23 A. On advice of my attorney, I take</p> <p>24 the Fifth.</p> <p>25 Q. And specifically, you were selling</p>	<p style="text-align: right;">Page 16</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. As of that date did your father,</p> <p>4 Jerry Steuerman, know detective James</p> <p>5 McCready?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. You had seen Detective James</p> <p>9 McCready in at least one of the bagel stores</p> <p>10 owned by you or your father prior to the time</p> <p>11 that the Tankleffs were killed. Is that</p> <p>12 correct?</p> <p>13 A. On advice of my attorney, I take</p> <p>14 the Fifth.</p> <p>15 Q. As of September 7, 1988, the date</p> <p>16 of the Tankleff murders -- let me put it this</p> <p>17 way. Prior to that date, Detective McCready</p> <p>18 had done work for your father, Jerry</p> <p>19 Steuerman. Is that correct?</p> <p>20 A. On advice of my attorney, I take</p> <p>21 the Fifth.</p> <p>22 Q. Your father had paid money to</p> <p>23 Detective McCready. Is that correct?</p> <p>24 A. On advice of my attorney, I take</p> <p>25 the Fifth.</p>

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<p style="text-align: right;">Page 17</p> <p>1 T. STEUERMAN</p> <p>2 Q. Specifically, he paid money to</p> <p>3 Detective McCready for construction work. Is</p> <p>4 that correct?</p> <p>5 A. On advice of my attorney, I take</p> <p>6 the Fifth.</p> <p>7 Q. He had also paid money to</p> <p>8 Detective McCready to protect the drug sale</p> <p>9 business that you were engaged in. Is that</p> <p>10 correct?</p> <p>11 A. On advice of my attorney, I take</p> <p>12 the Fifth.</p> <p>13 Q. In the months leading up to</p> <p>14 September 7th, 1988, your father, Jerry</p> <p>15 Steuerman, and Seymour Tankleff were arguing.</p> <p>16 Is that correct?</p> <p>17 A. On advice of my attorney, I take</p> <p>18 the Fifth.</p> <p>19 Q. In fact, you were present for more</p> <p>20 than one argument between them. Is that</p> <p>21 correct?</p> <p>22 A. On advice of my attorney, I take</p> <p>23 the Fifth.</p> <p>24 Q. And you were aware in the summer</p> <p>25 of 1988 that your father, Jerry Steuerman,</p>	<p style="text-align: right;">Page 19</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. You purchased your interest in</p> <p>4 that new store from your father. Correct?</p> <p>5 A. On advice of my attorney, I take</p> <p>6 the Fifth.</p> <p>7 Q. Specifically, you paid</p> <p>8 approximately \$125,000 for that ownership</p> <p>9 interest in the new store?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. And that took the form of about</p> <p>13 \$65,000 in cash and about \$60,000 of debt</p> <p>14 forgiveness. Is that correct?</p> <p>15 A. On advice of my attorney, I take</p> <p>16 the Fifth.</p> <p>17 Q. In the summer of 1988 you owed</p> <p>18 your father about \$60,000. Is that correct?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. And that \$60,000 debt related to</p> <p>22 your drug business. Is that correct?</p> <p>23 A. On advice of my attorney, I take</p> <p>24 the Fifth.</p> <p>25 Q. Seymour Tankleff had a lien</p>
<p style="text-align: right;">Page 18</p> <p>1 T. STEUERMAN</p> <p>2 wanted to open a new bagel store with you.</p> <p>3 Correct?</p> <p>4 A. On advice of my attorney, I take</p> <p>5 the Fifth.</p> <p>6 Q. Specifically, your father wanted</p> <p>7 to open a new store with you in Ronkonkoma?</p> <p>8 A. On advice of my attorney, I take</p> <p>9 the Fifth.</p> <p>10 Q. And you were aware that Seymour</p> <p>11 Tankleff wanted to be a 50 percent owner in</p> <p>12 that new store. Is that correct?</p> <p>13 A. On advice of my attorney, I take</p> <p>14 the Fifth.</p> <p>15 Q. And your father did not want</p> <p>16 Seymour Tankleff to have any ownership</p> <p>17 interest in that new business. Is that</p> <p>18 correct?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. And it was ownership of that new</p> <p>22 store with you that was the source of one of</p> <p>23 the areas of disagreement between your father</p> <p>24 and Seymour Tankleff?</p> <p>25 A. On advice of my attorney, I take</p>	<p style="text-align: right;">Page 20</p> <p>1 T. STEUERMAN</p> <p>2 against equipment in the bagel store that you</p> <p>3 operated and were part owner of. Is that</p> <p>4 correct?</p> <p>5 A. On advice of my attorney, I take</p> <p>6 the Fifth.</p> <p>7 Q. And that lien was also a subject</p> <p>8 of argument between your father and Seymour</p> <p>9 Tankleff?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. You know a gentleman by the name</p> <p>13 of Joseph Creedon. Correct?</p> <p>14 A. On advice of my attorney, I take</p> <p>15 the Fifth.</p> <p>16 Q. And you met Mr. Creedon prior to</p> <p>17 September 7th, 1988?</p> <p>18 A. On advice of my attorney, I take</p> <p>19 the Fifth.</p> <p>20 Q. And, in fact, you met Mr. Creedon</p> <p>21 while selling drugs. Is that correct?</p> <p>22 A. On advice of my attorney, I take</p> <p>23 the Fifth.</p> <p>24 Q. There were occasions on which Mr.</p> <p>25 Creedon robbed you. Correct?</p>

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<p style="text-align: right;">Page 21</p> <p>1 T. STEUERMAN</p> <p>2 A. On advice of my attorney, I take</p> <p>3 the Fifth.</p> <p>4 Q. Specifically, he robbed you of</p> <p>5 proceeds from your drug business?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. And you made payments to Mr.</p> <p>9 Creedon for protection?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. And when I say for protection,</p> <p>13 specifically, you paid Mr. Creedon, one, so</p> <p>14 that he wouldn't rob you any more. Correct?</p> <p>15 A. On advice of my attorney, I take</p> <p>16 the Fifth.</p> <p>17 Q. And you also paid him, two, to</p> <p>18 protect you from others. Is that correct?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. There were also occasions where</p> <p>22 you paid Mr. Creedon to collect drug debts</p> <p>23 that were owed to you?</p> <p>24 A. On advice of my attorney, I take</p> <p>25 the Fifth.</p>	<p style="text-align: right;">Page 23</p> <p>1 T. STEUERMAN</p> <p>2 that correct?</p> <p>3 A. On advice of my attorney, I take</p> <p>4 the Fifth.</p> <p>5 Q. You knew Mr. Glass as of September</p> <p>6 7th, 1988?</p> <p>7 A. On advice of my attorney, I take</p> <p>8 the Fifth.</p> <p>9 Q. And your father, Jerry Steuerman,</p> <p>10 also knew Mr. Glass?</p> <p>11 A. On advice of my attorney, I take</p> <p>12 the Fifth.</p> <p>13 Q. You were aware, Mr. Steuerman,</p> <p>14 that your father was looking to hire somebody</p> <p>15 to either kill or physically harm Arlene and</p> <p>16 Seymour Tankleff. Is that correct?</p> <p>17 A. On advice of my attorney, I take</p> <p>18 the Fifth.</p> <p>19 Q. Your father specifically told you</p> <p>20 prior to September 7th, 1988 that he was</p> <p>21 looking to hire somebody to intimidate,</p> <p>22 physically harm or murder Arlene and Seymour</p> <p>23 Tankleff?</p> <p>24 A. On advice of my attorney, I take</p> <p>25 the Fifth.</p>
<p style="text-align: right;">Page 22</p> <p>1 T. STEUERMAN</p> <p>2 Q. And you used Mr. Creedon for debt</p> <p>3 collection on multiple occasions. Is that</p> <p>4 correct?</p> <p>5 A. On advice of my attorney, I take</p> <p>6 the Fifth.</p> <p>7 Q. And that included that you use Mr.</p> <p>8 Creedon to collect drug debts for you prior to</p> <p>9 September 8, 1988?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. Your father, Jerry Steuerman, knew</p> <p>13 Mr. Creedon as well. Is that correct?</p> <p>14 A. On advice of my attorney, I take</p> <p>15 the Fifth.</p> <p>16 Q. Your father, Jerry Steuerman, knew</p> <p>17 Mr. Creedon prior to September 7th, 1988?</p> <p>18 A. On advice of my attorney, I take</p> <p>19 the Fifth.</p> <p>20 Q. In fact, you were the one who</p> <p>21 introduced Mr. Creedon to your father, Jerry</p> <p>22 Steuerman?</p> <p>23 A. On advice of my attorney, I take</p> <p>24 the Fifth.</p> <p>25 Q. You also knew Brian Glass. Is</p>	<p style="text-align: right;">Page 24</p> <p>1 T. STEUERMAN</p> <p>2 Q. Shortly after Mrs. Tankleff was</p> <p>3 murdered and Mr. Tankleff was attacked, your</p> <p>4 father disappeared. Is that correct?</p> <p>5 A. On advice of my attorney, I take</p> <p>6 the Fifth.</p> <p>7 Q. He feigned his own death. Is that</p> <p>8 correct?</p> <p>9 A. On advice of my attorney, I take</p> <p>10 the Fifth.</p> <p>11 Q. And he was later found living in</p> <p>12 California under an assumed name. Is that</p> <p>13 correct?</p> <p>14 A. On advice of my attorney, I take</p> <p>15 the Fifth.</p> <p>16 Q. Before he left he told you that he</p> <p>17 was going to feign his death and disappear.</p> <p>18 Correct?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. And, in fact, he asked that you</p> <p>22 report him missing to the police. Is that</p> <p>23 correct?</p> <p>24 A. On advice of my attorney, I take</p> <p>25 the Fifth.</p>

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September 23, 2013
25-28

<p style="text-align: right;">Page 25</p> <p>1 T. STEUERMAN</p> <p>2 Q. You were aware at the time that</p> <p>3 one of the people who went out to California</p> <p>4 to find your father was Detective McCready.</p> <p>5 Is that correct?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. And, in fact, you have said to at</p> <p>9 least one person that you thought it was</p> <p>10 particularly ironic that it was a friend of</p> <p>11 your father, Detective McCready, who went out</p> <p>12 to get him in California. Is that correct?</p> <p>13 A. On advice of my attorney, I take</p> <p>14 the Fifth.</p> <p>15 Q. In April of 1989 you told Joseph</p> <p>16 Creedon that your father would pay him, Mr.</p> <p>17 Creedon, to cut Marty Tankleff's tongue out of</p> <p>18 Marty's mouth. Is that correct?</p> <p>19 A. On advice of my attorney, I take</p> <p>20 the Fifth.</p> <p>21 Q. You also told Mr. Creedon that</p> <p>22 your father, Jerry Steuerman, would pay Mr.</p> <p>23 Creedon to have someone killed. Is that</p> <p>24 correct?</p> <p>25 A. On advice of my attorney, I take</p>	<p style="text-align: right;">Page 27</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. Your father told Mr. Creedon after</p> <p>4 he had refused to drop the charges, that Mr.</p> <p>5 Creedon was, quote: Fucking with the wrong</p> <p>6 people. Is that correct?</p> <p>7 A. On advice of my attorney, I plead</p> <p>8 the Fifth.</p> <p>9 Q. Your father, Jerry Steuerman, told</p> <p>10 you about the conversation that he had with</p> <p>11 Mr. Creedon about Mr. Creedon declining your</p> <p>12 father's offer to drop the charges. Is that</p> <p>13 correct?</p> <p>14 A. On advice of my attorney, I plead</p> <p>15 the Fifth.</p> <p>16 Q. As of September 7th, 1988, you</p> <p>17 knew Peter Kent. Is that correct?</p> <p>18 A. On advice of my attorney, I plead</p> <p>19 the Fifth.</p> <p>20 Q. You had engaged in criminal</p> <p>21 activities with Peter Kent?</p> <p>22 A. On advice of my attorney, I plead</p> <p>23 the Fifth.</p> <p>24 Q. As of September 7th, 1988 you knew</p> <p>25 Glen Harris?</p>
<p style="text-align: right;">Page 26</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. You specifically conveyed an offer</p> <p>4 from your father to pay him \$10,000 to have</p> <p>5 somebody killed.</p> <p>6 A. On advise of my attorney, I plead</p> <p>7 the Fifth.</p> <p>8 Q. Approximately two weeks later,</p> <p>9 also in April of 1989, you shot Joseph</p> <p>10 Creedon. Is that correct?</p> <p>11 A. On advice of my attorney, I plead</p> <p>12 the Fifth.</p> <p>13 Q. Why did you shoot Mr. Creedon?</p> <p>14 A. On advice of my attorney, I plead</p> <p>15 the Fifth.</p> <p>16 Q. After you shot Mr. Creedon, you</p> <p>17 are aware that your father, Jerry Steuerman,</p> <p>18 offered Mr. Creedon \$10,000 to drop the</p> <p>19 charges against you. Are you not?</p> <p>20 A. On advice of my attorney, I plead</p> <p>21 the Fifth.</p> <p>22 Q. Mr. Creedon told you that he would</p> <p>23 not agree to drop the charges. Is that</p> <p>24 correct?</p> <p>25 A. On advice of my attorney, I plead</p>	<p style="text-align: right;">Page 28</p> <p>1 T. STEUERMAN</p> <p>2 A. On advice of my attorney, I plead</p> <p>3 the Fifth.</p> <p>4 Q. You had engaged in criminal</p> <p>5 activities with Glen Harris?</p> <p>6 A. On advice of my attorney, I plead</p> <p>7 the Fifth.</p> <p>8 Q. In the 1980s, Mr. Steuerman, did</p> <p>9 you carry a knife with you?</p> <p>10 A. On advice of my attorney, I plead</p> <p>11 the Fifth.</p> <p>12 Q. Did you have a habit of carrying a</p> <p>13 knife with you?</p> <p>14 A. On advice of my attorney, I plead</p> <p>15 the Fifth.</p> <p>16 Q. In the late 1980s, did you sell</p> <p>17 knives?</p> <p>18 A. On advice of my attorney, I plead</p> <p>19 the Fifth.</p> <p>20 Q. Mr. Steuerman, did you ever give</p> <p>21 or sell a knife to Joseph Creedon?</p> <p>22 A. On advice of my attorney, I plead</p> <p>23 the Fifth.</p> <p>24 Q. Did you ever give or sell a knife</p> <p>25 to Peter Kent?</p>

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<p style="text-align: right;">Page 29</p> <p>1 T. STEUERMAN</p> <p>2 A. On advice of my attorney, I plead</p> <p>3 the Fifth.</p> <p>4 Q. Did you ever give or sell a knife</p> <p>5 to Glen Harris?</p> <p>6 A. On advice of my attorney, I plead</p> <p>7 the Fifth.</p> <p>8 Q. Your father, Jerry Steuerman, has</p> <p>9 admitted to you that he was responsible for</p> <p>10 the Tankleff murders.</p> <p>11 A. On advice of my attorney, I plead</p> <p>12 the Fifth.</p> <p>13 MR. POLLACK: Why don't we go off</p> <p>14 the record for a short break here.</p> <p>15 THE VIDEOGRAPHER: The time is</p> <p>16 1:31 p.m. and we're going off the</p> <p>17 record.</p> <p>18 (Recess taken.)</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 1:38 p.m. and we are on the record.</p> <p>21 BY MR. POLLACK:</p> <p>22 Q. Mr. Steuerman, have you ever told</p> <p>23 anyone that you knew that Martin Tankleff was</p> <p>24 not involved in the murder of his parents?</p> <p>25 A. On advice of my attorney, I take</p>	<p style="text-align: right;">Page 31</p> <p>1 T. STEUERMAN</p> <p>2 office?</p> <p>3 A. On advice of my attorney, I take</p> <p>4 the Fifth.</p> <p>5 Q. Have you ever distributed illegal</p> <p>6 drugs with anybody affiliated with Suffolk</p> <p>7 County Police Department?</p> <p>8 A. On advice of my attorney, I take</p> <p>9 the Fifth.</p> <p>10 Q. Have you ever distributed illegal</p> <p>11 drugs to any Suffolk County detective?</p> <p>12 A. On advice of my attorney, I take</p> <p>13 the Fifth.</p> <p>14 Q. Have you ever distributed illegal</p> <p>15 drugs to Detective James McCready?</p> <p>16 A. On advice of my attorney, I take</p> <p>17 the Fifth.</p> <p>18 Q. Have you ever distributed illegal</p> <p>19 drugs to Detective Norman Rein?</p> <p>20 A. On advice of my attorney, I take</p> <p>21 the Fifth.</p> <p>22 Q. Have you ever served as a</p> <p>23 confidential informant for Suffolk County law</p> <p>24 enforcement?</p> <p>25 A. On advice of my attorney, I take</p>
<p style="text-align: right;">Page 30</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. Mr. Steuerman, have you ever told</p> <p>4 anybody that you were involved in the murder</p> <p>5 of the Tankleffs?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. Have you ever told anyone that you</p> <p>9 knew that your father was involved in the</p> <p>10 murder of the Tankleffs?</p> <p>11 A. On advice of my attorney, I take</p> <p>12 the Fifth.</p> <p>13 Q. Have you ever told anyone that you</p> <p>14 knew that your father knew Detective McCready</p> <p>15 prior to the Tankleff murders?</p> <p>16 A. On advice of my attorney, I take</p> <p>17 the Fifth.</p> <p>18 Q. Mr. Steuerman, have you ever</p> <p>19 distributed illegal drugs to law enforcement</p> <p>20 personnel?</p> <p>21 A. On advice of my attorney, I take</p> <p>22 the Fifth.</p> <p>23 Q. Specifically, have you ever</p> <p>24 distributed illegal drugs to anyone affiliated</p> <p>25 with the Suffolk County District Attorney's</p>	<p style="text-align: right;">Page 32</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. Have you ever served as a</p> <p>4 confidential informant for any law enforcement</p> <p>5 agency?</p> <p>6 A. On advice of my attorney, I take</p> <p>7 the Fifth.</p> <p>8 Q. Mr. Steuerman, how frequently do</p> <p>9 you speak with your father?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. Have you spoken with your father</p> <p>13 about the Tankleff murders since receiving</p> <p>14 notice that you were going to be deposed in</p> <p>15 this lawsuit?</p> <p>16 A. On advice of my attorney, I take</p> <p>17 the Fifth.</p> <p>18 Q. You were originally represented</p> <p>19 with respect to this deposition by an attorney</p> <p>20 by the name of Justin Lite. Is that correct?</p> <p>21 A. On advice of my attorney, I take</p> <p>22 the Fifth.</p> <p>23 Q. Did you talk to your father about</p> <p>24 who should represent you for purposes of this</p> <p>25 deposition?</p>

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<p style="text-align: right;">Page 33</p> <p>1 T. STEUERMAN</p> <p>2 A. On advice of my attorney, I take</p> <p>3 the Fifth.</p> <p>4 Q. You retained the same law firm to</p> <p>5 represent you as the law firm that represented</p> <p>6 your father with respect to his deposition in</p> <p>7 this litigation. Is that correct?</p> <p>8 A. On advice of my attorney, I take</p> <p>9 the Fifth.</p> <p>10 Q. Who is paying for your counsel to</p> <p>11 appear here today?</p> <p>12 A. On advice of my attorney, I take</p> <p>13 the Fifth.</p> <p>14 Q. Mr. Steuerman, is there any</p> <p>15 question of substance that I can ask you today</p> <p>16 to which you would not assert your Fifth</p> <p>17 Amendment rights?</p> <p>18 A. On advice of my attorney, I take</p> <p>19 the Fifth.</p> <p>20 Q. Mr. Steuerman, you understand, do</p> <p>21 you not, that other than for murder, the</p> <p>22 statute of limitations has run on any criminal</p> <p>23 conduct you may have engaged in in the 1980s.</p> <p>24 Is that correct?</p> <p>25 A. On advice of my attorney, I take</p>	<p style="text-align: right;">Page 35</p> <p>1 T. STEUERMAN</p> <p>2 1:42 p.m. and this completes this</p> <p>3 session of the videotaped deposition of</p> <p>4 Mr. Todd Steuerman and this completes</p> <p>5 tape No. 1.</p> <p>6 (Time noted: 1:43 p.m.)</p> <p>7</p> <p>8</p> <p>9 <u>TODD STEUERMAN</u></p> <p>10</p> <p>11 Subscribed and sworn to before me</p> <p>12 this ____ day of _____, 2013.</p> <p>13</p> <p>14 _____</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 34</p> <p>1 T. STEUERMAN</p> <p>2 the Fifth.</p> <p>3 Q. Do you have such an understanding?</p> <p>4 A. On advice of my attorney, I take</p> <p>5 the Fifth.</p> <p>6 Q. And with murder or conspiracy to</p> <p>7 commit murder, you understand that the statute</p> <p>8 of limitations would not have run. Is that</p> <p>9 correct?</p> <p>10 A. On advice of my attorney, I take</p> <p>11 the Fifth.</p> <p>12 Q. And you believe that answering</p> <p>13 questions here today might incriminate you.</p> <p>14 Is that correct?</p> <p>15 A. On advice of my attorney, I take</p> <p>16 the Fifth.</p> <p>17 MR. POLLACK: I don't have any</p> <p>18 other questions.</p> <p>19 Anything from either the AG or the</p> <p>20 County.</p> <p>21 MR. MITCHELL: No, thank you.</p> <p>22 MR. TIPALDO: I have no questions.</p> <p>23 MR. POLLACK: Thank you, Mr.</p> <p>24 Steuerman.</p> <p>25 THE VIDEOGRAPHER: The time is</p>	<p style="text-align: right;">Page 36</p> <p style="text-align: center;">C E R T I F I C A T E</p> <p>STATE OF NEW YORK)</p> <p style="text-align: center;">: ss.</p> <p>COUNTY OF NEW YORK)</p> <p>I, ANNELIESE R. TURSI, a</p> <p>Registered Professional Reporter and Notary</p> <p>Public within and for the State of New York,</p> <p>do hereby certify:</p> <p>That the witness whose deposition</p> <p>is hereinbefore set forth, was duly sworn by</p> <p>me and that such deposition is a true record</p> <p>of the testimony given by the witness.</p> <p>I further certify that I am not</p> <p>related to any of the parties to this action</p> <p>by blood or marriage, and that I am in no way</p> <p>interested in the outcome of this matter.</p> <p>IN WITNESS WHEREOF, I have</p> <p>hereunto set my hand this ____ day of</p> <p>_____, 2013.</p> <p style="text-align: center;">_____ ANNELIESE R. TURSI, RPR</p>

September 23, 2013
37-40

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